

EXHIBIT 14

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH and WEST
PUBLISHING CORPORATION,

Plaintiffs,

vs.

C.A. NO. 20-613-LPS

ROSS INTELLIGENCE INC.,

Defendant.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF
ISABELLE MOULINIER, 30(b)(6) REPRESENTATIVE FOR
THOMSON REUTERS ENTERPRISE CENTRE GMBH
HIGHLY CONFIDENTIAL

DATE: July 1, 2022

TIME: 9:07 a.m.

PLACE: 150 South Fifth Street, Suite 1775
Minneapolis, MN 55402

JOB NO.: SF 5264242

REPORTED BY: Dawn Workman Bounds, CSR

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1 A P P E A R A N C E S

2 ON BEHALF OF PLAINTIFFS and WITNESS:

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21

22

23 ALSO PRESENT:

24

25 BRIAN CICCONE, VIDEOGRAPHER

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I N D E X

WITNESS: ISABELLE MOULINIER	PAGE
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Exhibit 1 Defendant Ross Intelligence Inc.'s Amended Notice of 30(b)(6) Deposition to Plaintiff Thomson Reuters Enterprise Centre GMBH.....	6
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TIME ON THE RECORD:

Mr. Ramsey - 3 hours, 8 minutes

Mr. Simmons - 1 minute

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good morning. We are
3 going on the record at 9:07 a.m. Central Daylight Time on
4 July 1, 2022. This is Media Unit Number 1 of the
5 video-recorded deposition of Isabelle Moulinier, taken by
6 counsel for defendant in the matter of Thomson Reuters
7 Enterprise, et al. versus Ross Intelligence Inc., filed
8 in the United States District Court for the District of
9 Delaware, Case Number 20-613-LPS.

10 This deposition is being taken in
11 Minneapolis, Minnesota. My name is Brian Ciccone
12 representing Veritext Legal Solutions, and I am the
13 videographer. The court reporter is Dawn Bounds also
14 from Veritext Legal Solutions.

15 Will the attorneys please note their
16 appearances for the record.

17 MR. RAMSEY: This is Gabriel Ramsey joined
18 by my colleague Kevin Cacabelos of Crowell & Moring. We
19 represent the Defendant Ross Intelligence.

20 MR. SIMMONS: I am Joshua Simmons. With
21 me is Roma Lopes. We're from Kirkland & Ellis, and we
22 represent the Plaintiffs as well as the witness.

23 THE VIDEOGRAPHER: Thank you.

24 Will the court reporter please swear in
25 the witness.

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1 (Witness sworn.)

2 THE VIDEOGRAPHER: You may proceed.

3 ISABELLE MOULINIER,

4 having been first duly sworn, testified as follows:

5 EXAMINATION

6 BY MR. RAMSEY:

7 Q. Good morning, Ms. Moulinier. Did I say that
8 right?

9 A. Moulinier, yes.

10 Q. Moulinier. Okay. Great.

11 In the ballpark.

12 Have you ever had your deposition taken
13 before?

14 A. No.

15 Q. You never -- okay. So your counsel's probably
16 given you the basics, and I'll kind of rep -- probably
17 repeat some of the points.

18 I'll be asking you questions, would
19 appreciate if you'd give me your best and most, you know,
20 full and complete answer to the best of your ability.
21 Can we agree on that?

22 A. We can.

23 Q. Okay. It's important -- obviously everything's
24 being taken down in a written form here, so it's
25 important that I not talk over you when you're finishing

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1 BY MR. RAMSEY:

2 Q. All right. You have been handed a document
3 marked Exhibit 1. It's labeled Amended Notice of
4 30(b)(6) Deposition to Plaintiff Thomson Reuters
5 Enterprise Centre GMBH.

6 I'll represent to you that this is the
7 notice for the corporate deposition of the plaintiffs.
8 And it's my understanding that you've been designated to
9 testify on topics 12, 35 and 36, which are listed a
10 little deeper in the document.

11 MR. SIMMONS: For the record, I'll note
12 that there's a separate notice to West Publishing but it
13 is substantially the same, and the witness has been
14 designated on topics 12, 35 and 36 subject to our
15 objections; and we sent an e-mail on April 8, 2022,
16 specifying the nature of what she'd be here to talk
17 about.

18 MR. RAMSEY: All right.

19 BY MR. RAMSEY:

20 Q. Have you actually seen this document before, or
21 no?

22 A. I've seen the first page of the document
23 before.

24 Q. Okay. All right. If you could turn to just --
25 to topic 12 on page 6.

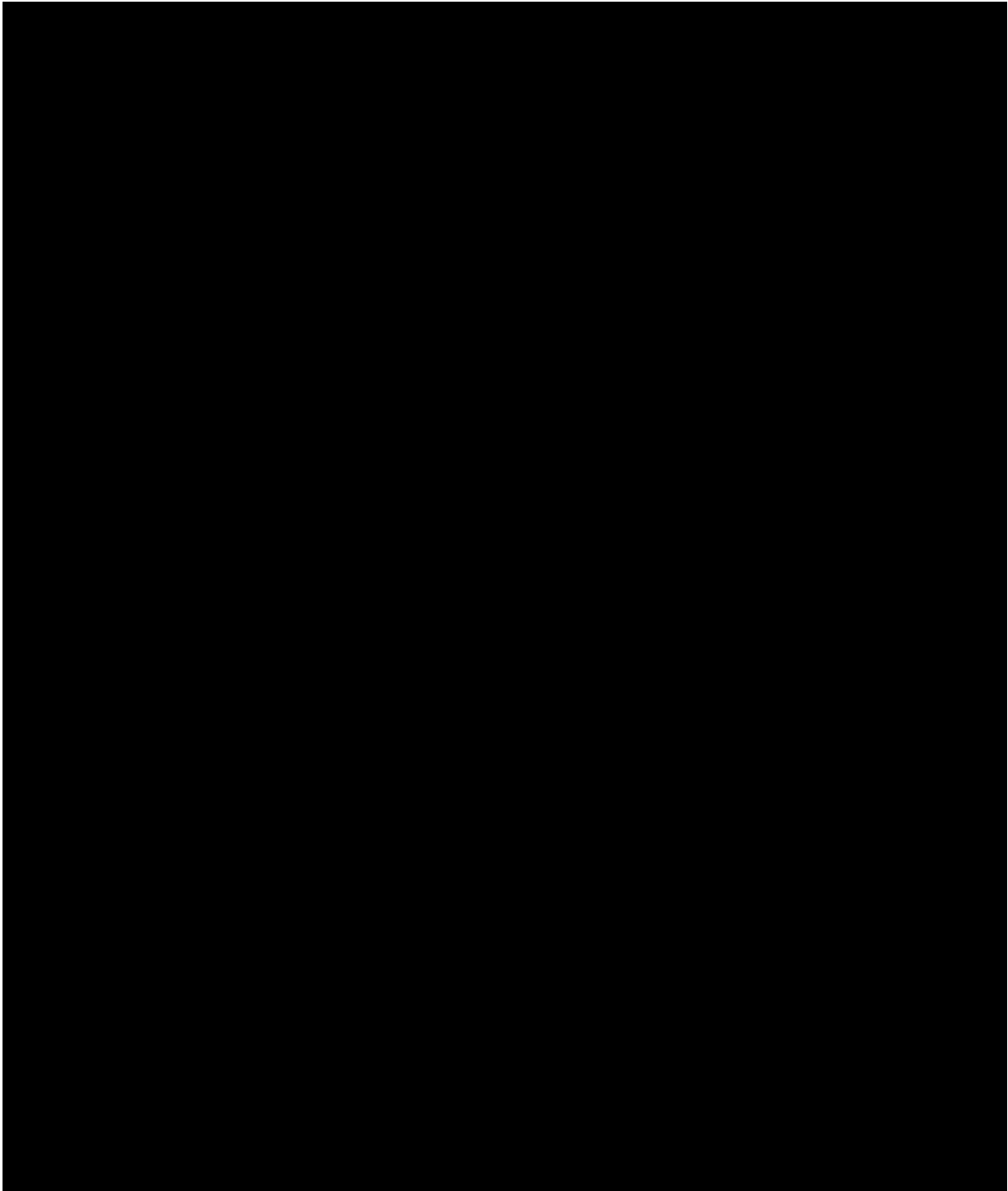
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1 That topic is the relationship between the
2 headnotes and key numbers and the Westlaw search engines.

3 Do you see that?

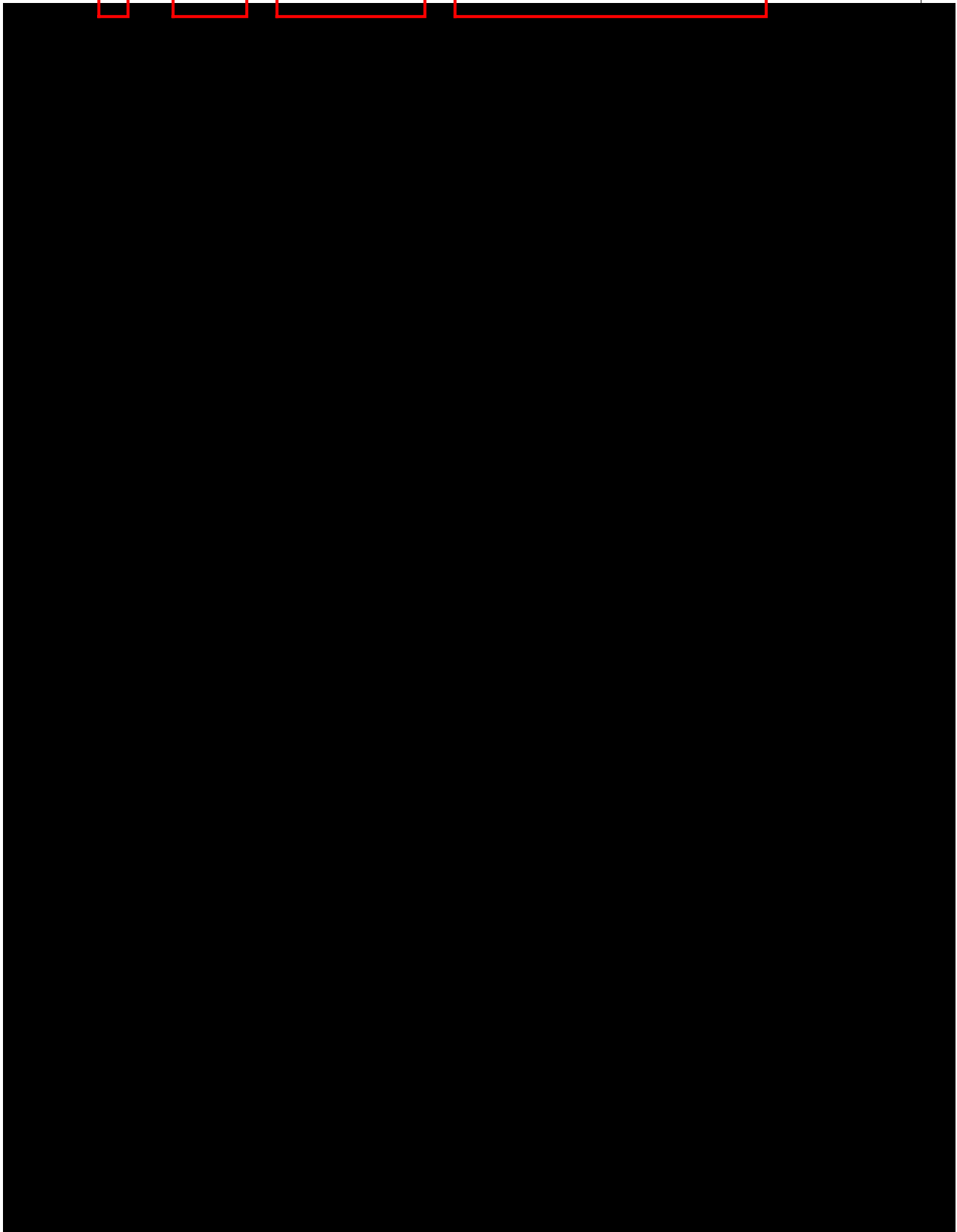
4 A. I do see that.

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REPORTER'S CERTIFICATE

STATE OF MINNESOTA)
) ss.

COUNTY OF HENNEPIN)

I hereby certify that I reported the deposition of ISABELLE MOULINIER, 30(b)(6) REPRESENTATIVE FOR THOMSON REUTERS ENTERPRISE CENTRE GMBH, on the 1st day of July, 2022, in Minneapolis, Minnesota, and that the witness was by me first duly sworn to tell the whole truth;

That the testimony was transcribed by me and is a true record of the testimony of the witness;


That the cost of the original has been charged to the party who noticed the deposition, and that all parties who ordered copies have been charged at the same rate for such copies;

That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel;

That I am not financially interested in the action and have no contract with the parties, attorneys, or persons with an interest in the action that affects or has a substantial tendency to affect my impartiality;

That the right to read and sign the deposition by the witness was not waived.

WITNESS MY HAND AND SEAL THIS 20th day of July, 2022.



Dawn Workman Bounds, CSR 6129
Notary Public, Hennepin County, Minnesota
My commission expires January 31, 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs, Counterdefendants,

V.

ROSS INTELLIGENCE INC.,

Defendant, Counterclaimant.

C.A. No. 20-613-SB

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA
FOR THE DEPOSITION OF ISABELLE MOULINIER**

I, the undersigned, do hereby declare that I read the deposition transcript of Isabelle Moulinier dated July 1, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

[illegible]

[illegible]

[illegible]

[illegible]

Dated: August 19, 2022

Isabelle Moulinier

